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Via ECF

Hon. Sanket J. Bulsara, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Fajardo, et al. v. WB Maintenance & Design Group Inc., et al.
Civil No. 1:21-cv-5236-PKC-SJB**

Dear Judge Bulsara:

We represent Defendants W.B. Maintenance & Design Group Inc., W.B. & Son Construction Corp., Wladimir Briceno, Betty Briceno, Jeissy Briceno, and Jeimy Briceno (“W.B. Maintenance Defendants”) in the above-referenced matter. We are writing to request an extension of the deadline by which the W.B. Maintenance Defendants must file their motion to apply the automatic bankruptcy stay to Wladimir, Betty, Jeissy, and Jeimy Briceno. Plaintiffs’ counsel has consented to this request.

The reason for the extension request is that the Plaintiffs and the Defendants have reached a settlement in principle as to all FLSA claims. The only remaining issue is payment terms, which we hope to be resolved shortly. Under the terms of the proposed settlement, the only remaining claim will be the New York assault and battery claim against Defendant Alex Briceno.

We are suggesting a thirty (30) day extension to permit the parties ample time to reach full agreement and document same.

Thank you for your time and attention to this matter.

Respectfully submitted,

By: /s/ Steven Siegler
Steven Siegler, Esq.